Ecodesign for electronic displays

ECOS response to the proposed removal of the ban on halogenated flame retardants

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Executive summary

The European Commission is preparing to update the ecodesign measure on electronic displays. The current proposal developed by the Commission's consultants suggests eliminating the ban on halogenated flame retardants (HFRs) in display stands and enclosures, which has applied since 2021.

The ban on HFRs should be maintained at this time, for several reasons. It is too early to assess due to the timeline and duration of use of these products. There is insufficient evidence to support the claim that the removal of the ban would improve recyclability. In addition, the regulatory landscape for flame retardants and plastics recyclability is still evolving. Overall, removing the ban now would not be coherent with other EU policies and aims for the circular economy.

Our main recommendation in this paper is to keep the restriction on HFRs in place. We also present recommendations for the consultants to consider for the improvement of recyclability, material efficiency, and circularity. This includes setting recycled content targets for displays from WEEE plastics, extending the ban on HFRs to include substitute chemicals that contaminate waste streams, improving chemical and material transparency via the adoption of digital product passports, and additional research into innovative redesign options and substances (which hinder recyclability).

Background

In 2019, the European Commission regulation 2019/2021 laid down ecodesign requirements for electronic displays under Directive 2009/125/EC.[1] These requirements included for the first time a chemicals restriction based upon recyclability concerns, contained within Annex II, banning the use of halogenated flame retardants (HFRs) in the enclosures and stands of electronic displays. Annex IV included a verification procedure for market surveillance. The regulation began to apply in March 2021.

The ban was intended to enable recycling. Other measures in this area included the marking of plastic components which contain flame retardants. Banning HFRs was supposed to improve the material efficiency and circularity of electronic displays by increasing the amount of plastic coming from displays that could be safely recycled. Flat panel displays such as televisions and external monitors are an increasing waste stream in the EU and globally, with the trend moving towards larger screens.

Plastics containing any HFR substances cannot be mechanically recycled at this time due to restrictions on certain brominated flame retardants and the lack of technological or cost-effective solutions to detect and remove the restricted substances from the recycling stream. Thus, any plastic with any HFR substance ends up being incinerated. The incineration of plastics containing these hazardous substances is problematic.

- The incineration of HFRs leads to the formation of other hazardous substances like dioxins and furans.[2]
- Incineration impedes recycling and removes a potential resource from future use. In a moment when the EU is prioritising the use of secondary materials to boost strategic autonomy, competitiveness, and circularity, it is important that products are designed to be recycled.

Flame retardants when used in plastics can be either additive or reactive. Additive flame retardants are mixed into the polymer and not chemically bonded, meaning the substances are likely to migrate into air or dust during the use phase of the product.

Reactive flame retardants are chemically bonded to the polymer, meaning they are not likely to migrate. Halogenated flame retardants are typically used as additives in display enclosures and stands.

ECOS advocated for the 2019 ban while pushing for the elimination of chemical flame retardants as much as possible via redesign or other alternatives like use of a metal enclosure instead of plastics. In the mid-2010s, the US company Best Buy indicated that by removing the power source from inside the screen and using an external power supply (such as is used with laptop computers), the use of flame retardants in the screen itself could be eliminated, thus improving the recyclability of the biggest plastic parts.[3] Other alternative design measures mentioned in the 2019 Impact Assessment include using "shields between circuit boards and the enclosure, or increasing the separating space".[4]

Analysis

We present three main arguments why the ban on HFRs should be maintained in the upcoming revision of the ecodesign measure for electronic displays:

- It is too early to assess the effects of the current ban.
- There is insufficient evidence to support the removal of the ban.
- To remove the ban in this time of the evolving regulatory landscape risks incoherence with other EU efforts to support a clean circular economy.

We also present more information about substitute chemical flame retardants, particularly the organophosphate flame retardants (OPFRs) most likely to be used, and why these substances are not an appropriate substitute due to their lack of recyclability and unproven safety. In addition, restrictions on HFRs are often included in voluntary standards for the sector and to remove it via ecodesign would counteract the EU's aims to be at the forefront of sustainable product policies.

Too early to assess

To remove the ban on HFRs now is premature - it is too early to assess the effectiveness of the ban due to the lifetime duration of displays and the timeline of the measure. Most consumers keep a display/screen for at least, or longer than, five years so it is not yet fully known what the effects of the ban might be. **The current evaluation began in December 2023, only 2.5 years from the application date of the 2019 measure.** This issue is indicated clearly in the recent consultation documents.[i]

- In April 2025, documents shared by Fraunhofer include the following information on slide 86, titled "Stipulations to enable recycling: EcoDesign regulation requirements (Annex II D): "In principle, it is not easy to assess the influence of regulation in the recycling sector, as regulation has only been in force for 4 years. **This means that the devices covered by the regulation should not yet be in the recycling cycle**."
- The current document, from June 2026, states on slide 15 in the Introduction: "Generally, **it is not easy to assess the impact** of regulation in some areas such as the repair or **recycling sector,** as the regulation has only been in force since 1 March 2021."[5]

[i] Emphasis added by ECOS

Insufficient evidence base

There is a lack of independent and validated scientific data to support the elimination of the current ban. The chemicals industry creates more substances than can be evaluated for safety and health; the recycling and end-of-life aspects of chemicals are studied even less.

The justifications given by the consultants mainly claim that the ban on HFRs has not increased recyclability and that the substitute chemical flame retardants are contaminating the waste stream.

Slide 78 from the documents shared at the June 2026 meeting says[6]:

- *Unclear if HFR ban has increased recycling rate in reality*
    - *Recyclers suggest it is counter-productive*
    - *Other inquiries support this view: dismantlers, recycling associations, EU and US scientific experts, researchers, NGOs, scientific publications*

Without any citations, quotations, references, or specifics, these points cannot be used to justify a change in policy. The use of the term "suggest" is also not convincing, especially in light of the timeline of the new displays and their entry into the recycling stream. The "inquiries" line should also be supported in detail.

In the consultants' report, on page 79 of the June 2026 slide deck, it is stated that plastics containing "PFRs" (likely to mean phosphorus flame retardants, but not defined in the text) are "not in industrial practice" recyclable, and "affect material's properties."[7] The slide also says that:

- *Recycler concerns about WEEE plastic downcycling due to increased PFR contamination, i.e. reuse only in lower grade applications or economically not recyclable (poor quality plastics mix)*

If it is the case that phosphate-based flame retardants are also posing problems for recyclability and the circularity of plastics, then this revision should take a pro-active approach and make sure these substances are not also contaminating the recycling stream, via a restriction similar to the current one on HRFs. But on this point as well, more evidence is needed.

Much of the information used in current regulatory documents seems to come from industry sources. A report published by International Bromine Council (BSEF) with dss+ in September 2023, "Brominated Flame Retardants and the Circular Economy of WEEE Plastics"[8] is a frequently referenced work.

In 2024, the BSEF published a position paper on the revision of the ecodesign requirements for electronic displays. The paper, which is mostly concerned with points on regulatory coherence and fire safety, includes the below two paragraphs on recyclability and circularity:

- *The European Commission argues that the presence of HFRs in waste hinders recycling. However, this argument is not supported by any scientific data, conversely, there is evidence that BFR plastics are currently integrated in the circular economy and effectively recycled. A recent study carried out by DSS+ recycling experts shows that BFR containing plastics from EEE are well-controlled and easily sorted during conventional recycling processes. Currently, over 95% of BFRs can already be eliminated in WEEE plastics, and new techniques such as solvent based recycling, thermolysis, and gasification are showing potential in converting plastics to fundamental elements and fresh materials.*
- *The vast majority of WEEE plastics containing bromine are processed to result in plastics free of BFRs or with <2,000 PPM of bromine. The separated polymers from WEEE will then be extruded and if needed compounded. Plastics recycling saves large amounts of CO2 emissions and energy compared to virgin plastics. The data above is already outstanding given that the issue of waste treatment of plastics from electronic and electrical equipment, including displays and stands, is part of a much more complex situation involving multiple variables beyond flame retardant additives, such as overall additive loadings, multiplicity of polymer types and broader issues with WEEE collection systems.*

A single industry paper should not be used as a justification to change a regulation until independent research verifies the claims. Caution must be applied to claims about new techniques until these processes can be thoroughly researched for their safety, their efficacy, and their efficiency.

It is also unclear in the processes above if "95% of BFRs" are actually being eliminated, and if so, what happens to the remaining 5% of the BFRs that are not. In any case, claims of new (as of yet unproven) technologies is not an adequate justification for the elimination of the current ban.

Recyclability and detection

The detection and sorting of plastics at recycling facilities is an ongoing challenge for the sector. Sorting must be swift and effective to help improve profitability of recycling plastics but also to ensure that restricted substances do not end up in the recycled material.

There are different detection and sorting methods used by plastic recyclers. The quickest and most cost-effective is using a density test. This test reveals the presence of heavier compounds like bromine in the plastics which can then be removed from the recycling stream for incineration. Plastics containing OPFRs, as noted in the proposal, cannot be easily separated by the density test method, and because there does not yet exist a Digital Product Passport (DPP), there are not yet effective and swift ways to identify OPFRs in plastic matrices in the recycling stream.

This point is reinforced within the minutes of the third stakeholder meeting on ecodesign materials from 25 April 2025.[9] Page seven of these minutes includes the notes of a discussion about the use of HFRs. The Commission's Consultants are summarised to have said, in support of the current ban:

- *Concerning the status quo for recycling of plastics containing halogenated flame retardants: there is a separation process followed in recycling plants, separating plastics with high levels of halogenated flame retardants from plastics with low levels. However, for the fraction with high levels, it is difficult to verify which types of halogenated flame retardants were used and therefore they are simply not recycled. We are still assessing this topic but it seems that there is lack of trust of the recycling information provided by manufacturers and a concern over the composition of the plastic materials.*

A 2023 paper, Recycling plastics from e-waste: Implications for effective eco-design examined the practices at several different recycling facilities handling plastics from WEEE.[10] In the four studied facilities, the range of waste plastics due to BFRs and phthalates were between 40-70%, with these wastes sent to incinerators.

Other methods include using X-Ray Fluorescence (XRF) or sliding spark spectroscopy, to detect certain elements, again mostly bromine. Neither of these methods can perfectly identify all brominated flame retardants, nor can they detect non-brominated, halogenated flame retardants.[11]

The spectroscopy detection methods in particular can be expensive and time consuming for recycling operators. On the other hand, a case study published by Fidra (a UK environmental charity) looked at a Scottish based recycling and waste management company called Restructa; the report shows that "a scalable, rapid, and robust" XRF technique for sorting waste plastics from TVs can be implemented."[12] The technique at Restructa also includes using a database of models (built by Restructa) via an app to identify waste plastics that can or cannot be recycled based on their POPs levels. The company "has been able to recover 72% of plastics from TVs and monitors which were identified as being suitable for recycling."[13]

As noted in the consultants' research, the polymer marking on plastic components is not trusted by recyclers and the requirement to continue the marks is slated to be removed. In the Restructa study, the waste handlers, instead of relying on a polymer parking, are scanning the manufacturer's label to match existing data about models within the database.

The Restructa case study provides some insight into how better recycling techniques, paired with new technologies, could be further improved upon and implemented to increase recycling rates of these plastics. This type of sorting technique can be further refined with the introduction DPP to provide additional information.

Increasing the recyclability of plastics from display enclosures and stands relies on both clean materials free from contaminating substances (HFRs and, as likely to be found, OPFRs) and effective techniques that do not add complexity to the work of recyclers. The 2023 study "Recycling plastics from e-waste: implications for effective eco-design" emphasises certain ecodesign measures that would drive increased recycling: these include targets for recycled content, standardising of materials, improved transparency, banning hazardous substances, and avoiding the use of halogenated polymers.[14] Removing the ban on HFRs will not improve the circularity of displays or of other plastic material stream; but it would return a hazardous substance back into the material cycle, which is not coherent with EU aims on health and safety nor on circularity. Other policy options to improve recyclability should be investigated and supported.

Evolving regulatory landscape

To remove the ban on HFRs now risks moving in the opposite direction from other EU policy developments. Potential flame retardant restrictions under REACH, an update of the WEEE Directive, and supports to the plastic recycling sector under the Circular Economy Act could all lead to significant changes in manufacturing, disposal, and recycling of electronic displays. With so many moving pieces in the regulatory process, to remove the ban will create even more uncertainty for manufacturers.

Chemical safety restrictions on flame retardants are governed via several measures, including: the Restriction of Hazardous Substances (RoHS) Directive, REACH, and the Persistent Organic Pollutants (POPs) Regulation. A potential group restriction under REACH for some types of brominated flame retardant substances is pending.[15] This potential restriction was based on the EU Regulatory Strategy for flame retardants[16] from 2023, which was followed by an investigation report on aromatic brominated flame retardants[17] in 2024. DG Grow then issued a mandate for ECHA to prepare a restriction dossier on non-polymeric additive aromatic brominated flame retardants in 2025.

The current proposal by the consultants says, on page 80[ii]: "*Some PFRs are under the scope of REACH. If restricted, **all** PFR containing plastics will **probably** be sorted out (similarly to BFRs).*[18]

Regulatory policy should not be made based on assumptions. As part of the above mandate on flame retardants, ECHA will prepare additional reports, including two reports on OPFRs. In the most recent version of the Restriction Roadmap published by ECHA, OPFRs have been included, which indicates a prioritisation for a REACH restriction. But the timeline on the next steps for any activities for OPFR is unclear and likely nothing will happen within the next 18 months, which means that any restrictions will not be enacted for several years.

The Waste Electrical and Electronic Equipment (WEEE) Directive (2012/19/EU) sets requirements on the separate collection and treatment of electronic waste, including the removal of components containing hazardous substances. According to Article 8(2) of this Directive, LCD screens over 100 cm^2 and plastics containing brominated flame retardants must be collected separately. Article 4 of the WEEE directive, on product design, specifically mentions ecodesign requirements that facilitate re-use, dismantling, and recovery. While the WEEE Directive was a major step forward when introduced in 2012, it is no longer fit for purpose and must be updated to account for the growing e-waste crisis and the low collection levels in many locations.[19]

[ii] Emphasis added by ECOS

As the Circular Economy Act proposal has not yet been released, nor negotiated and decided, the eventual outcome as it relates to the European recycling industry cannot be predicted. It is possible that with the WEEE Directive update, and other measures contained within the CE Act, that advancements and supports for the European recycling sector could improve upon separate collection, dismantling, plastics sorting, and other areas that challenge the sector's profitability.

The Ecodesign for Sustainable Products Regulation may eventually require Digital Product Passports (DPP) for all products covered under the Regulation.[20] This requirement is not yet being considered for electronic displays, even though it could substantially improve the ability for its plastics to be properly identified and sorted. Because electronic displays are already covered by the EPREL database, the European Commission may decide to exempt this product group from the requirement to carry a DPP, even though, at the moment, EPREL does not carry information related to chemicals or materials.

Precautionary principle and evidence-based policymaking

We are concerned that the effort to remove the ban is coming not from evidence-based policymaking but instead via an attempt to simplify the current regulation governing the sector. These simplification efforts have typically been taking place via Omnibus proposals which have been under critique by civil society lack of proper regulatory participation and engagement, and for which the European Ombudswoman has called "maladministration."[21] This proposal and its current justifications have similarities to those processes. The reliance on uncited bullet points in a slide deck and lack of validated scientific data sources means that stakeholders are not able to access neutral information.

Moreover, the proposal is not in line with the EU's precautionary principle (PP). A recently published legal analysis delves into the recent simplification measures and how they undermine the PP.[22] The entire paper is worth reviewing; some key messages as relates to this proposal are here:

> *At the core of the Omnibus problem lies a lack of sufficient (if any) justification. The EC has not demonstrated that such safeguards or alternatives to the alleged "simplification" measures were seriously considered, much less that they proved incapable of achieving simplification objectives while preserving precautionary safeguards, because it presupposed that the protection of human health and the environment is not affected in the first place. In technically complex environmental and health matters, the deployment of the PP under a proportionality lens requires a reasoned and reviewable account of why a more protective alternative would not suffice.*
>
> *Once environmental protection has been embedded across multiple fields of EU policy, any legislative reduction in protection must be treated as an exception requiring explicit, evidence-based, and democratically accountable justification.*

The consultants to the study have not shared information beyond three slides containing high-level bullet points; thus if the policymakers have additional evidence to support their points, it should be shared with stakeholders. This raises two concerns.

First, if there is validated, scientific data available to support the removal of the HFR ban, but it is not being shared with stakeholders, then this process does not meet "Better Regulation" standards. These standards are in place to allow stakeholders to understand the rationale of the proposals.

Second, if there is indeed a lack of data, this process is in violation of the principle of evidence-based decision-making which was recently re-enforced in the Commission Communication (2026) 380, "A Simpler, Clearer and Better Enforced EU Rulebook."[23] In this Communication, the Commission emphasises the need to "secure the strongest possible evidence base."

OPFRs and other substitutes

After several years of the application of the 2019 ecodesign ban, the industry has not adapted with innovative measures like a redesign of the power supply but instead is substituting other similar substances in what is a textbook case of regrettable substitution, from HFRs to, most often, Organophosphorus flame retardants (OPFRs).

The ECHA investigation report analysed potential alternatives for aromatic brominated flame retardants.[24] Some of these alternatives are polymers, which means they are not required to be registered or evaluated under REACH. The investigation report includes this point on alternatives (pg 68): "Approximately half of the alternative flame retardants identified have not been assessed yet either because they are not registered under REACH or because they have not been prioritised for assessment." The report identified five substances where relevant hazard concerns were identified. Substitutes are being used that are not yet comprehensively evaluated under REACH or other chemical safety regulations.

OPFRs meanwhile seem to present similar problems as HFRs. They are not chemically bound and may release into the environment similarly to HFRs. They are already present in the environment and can be found in air, water, and soil; they are also found in indoor dust.[25] OPFRs may also be endocrine-disruptors and have other observed hazards such as neurotoxicity. **To substitute HFRs for OPFRs is not a safe substitution.**

Voluntary standards

To remove the ban on HFRs would be to take a step backward from industry standards.

The voluntary standard TCO Certified continues to restrict the intentional use of halogenated substances in display "housing".[26] In its mandate on halogenated substances, the guideline for displays reads: "product housing [...] must not contain intentionally added (additive or reactive) halogenated flame retardant, plasticizer or vinyl polymer stabilizer substances". The standard also provides a pathway for assessing of alternative chemicals, utilising the GreenScreen for Safer Chemicals framework, and the ChemFORWARD hazard banding system.

Certified products under TCO Certified can use non-halogenated flame retardants appearing on the public TCO Certified Accepted Substance list[27], after being evaluated and accepted by either GreenScreen or ChemFORWARD standards.

Recommendations

Main recommendation

Maintain the ban on HFRs in display casings and enclosures until at least the next revision so that the other regulatory aspects can be completes – at minimum after the potential REACH restrictions on ABFRs and OPFRs and the CE Act are completed and in force. The WEEE Directive update along with CE Act, should require higher targets for collection and support for the plastic recycling sector. This could include a deposit return scheme of some kind for electronic displays.

Additional recommendations

- Set recycled content target(s) for plastic materials in displays which specify that WEEE plastics should be used. This would create a market for the recyclates, lower material costs, and help move the sector towards a closed loop system. With closed loops, there would be less risk of hazardous substances making their way into other products made with recycled materials.

- More actions should be taken on substances of concern:
    - If OPFRs cannot be effectively recycled, then they should be included in the ban under ecodesign – this could be included in the current revision.
    - The European Commission could include a requirement that only safe, recyclable flame retardants are used. The first step here could be to empower ECHA to undertake a study, similar to those ongoing for substances of concern in packaging and end-of-life vehicles, to determine which substances hinder recycling for WEEE plastics, and then utilising the information coming from ECHA to determine which substances can be approved for use in EEE plastics.
- Chemical and material information and transparency:
    - Accelerate the adoption of DPPs for electronic displays to facilitate reliable polymer and chemical information transparency. The current EPREL database does not include this information, and as seen in the Restructa study, more information could assist recyclers. Requirements could include not just information on flame retardants and polymers, but more complete requirements on substances of concern as outlined in the ESPR.
    - The Commission could also establish its own database to facilitate European recyclers to better manage the chemicals and materials entering their waste streams. This was, after all, an aim of the SCIP database, though it was not achieved in practice.
- Innovations in redesign should also be encouraged. While the current ecodesign measure aims to reduce energy consumption and carbon emissions, a scientific study should be undertaken to understand more fully the life cycle emissions and energy consumption if innovative redesign options were combined with a closed loop, WEEE-EEE material use system. It may be the case that by closing the loop and using external power supply systems, that the emissions could be lower overall than by solely focusing on energy efficiency points. This would require a more in-depth analysis of the sector than has been done.

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